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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

AUBREY YOUNG,

Defendant.

COMPLAINT

(T. 21, USC §§ 952(a)
and 960)

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EASTERN DISTRICT OF NEW YORK, SS:

DONALD FARRIER, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about February 27, 2015, within the Eastern District of New York and elsewhere, the defendant AUBREY YOUNG did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


1. On or about February 27, 2015, the defendant AUBREY YOUNG arrived at John F. Kennedy International Airport in Queens, New York, aboard Caribbean Airlines Flight No. 524 from Georgetown, Guyana.

2. Customs and Border Protection (“CBP”) officers selected the defendant AUBREY YOUNG for an inspection. He presented two checked suitcases for examination. YOUNG told CBP, in substance, that the bags and their contents were his, and that he had not brought anything with him on behalf of someone else. YOUNG’s two suitcases were locked, and YOUNG opened the lock for the first suitcase so that the examination could be performed. YOUNG was visibly nervous, and struggled to open the lock for the second suitcase because his hands were shaking. A CBP officer assisted YOUNG to open the lock for the second suitcase. After the suitcases were unlocked, and before the CBP officer began examination of the first of YOUNG’s two suitcases, YOUNG stated that he had milk powder in the suitcase for his son. During examination of the suitcase, the CBP officer noticed that there were bags of powder wrapped in clothes in the suitcase. A CBP officer made a small hole in one of the bags of powder, and found a white powdery substance.

3. A field test of the white powdery substance described above was performed, and the substance tested positive for cocaine. The defendant AUBREY YOUNG was placed under arrest.

4. Approximately 7,155.8 grams of cocaine was seized from one of , YOUNG's suitcases. Approximately 5,147.7 grams of cocaine was seized from YOUNG's other suitcase. Thus, in total, approximately 12,303.5 grams of cocaine (gross weight) was seized from defendant YOUNG's two suitcases.

WHEREFORE, your deponent respectfully requests that the defendant AUBREY YOUNG be dealt with according to law.


DONALD FARRIER
Special Agent
Homeland Security Investigations

Sworn to before me this
28~~th~~ day of February, 2015

THE HONORABLE STEVEN I. LOCKE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK